

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-____-E**

IN RE:)	
The Request of Beulah Solar, LLC to Toll)	
the Deadline for Milestone Payment #1)	
)	REQUEST
)	

INTRODUCTION

Beulah Solar, LLC, (hereinafter as, “Beulah Solar”), is located in South Carolina and is a wholly owned subsidiary of Cypress Creek Renewables, LLC, (hereinafter as, “Cypress Creek”). Beulah Solar hereby requests that this Commission toll the deadline of November 20, 2018, for Milestone payment #1, (“Deadline”), under that certain Interconnection Agreement, dated September 24, 2018, (hereinafter as, the “IA”) with South Carolina Electric & Gas Company, (hereinafter as, “SCE&G”).

REQUEST

1. Beulah Solar requests that this Commission inquire into this matter and toll the Deadline. The Grounds for this Request are that Beulah Solar is unable to complete financing for the project due to the temporary uncertainty regarding SCE&G’s creditworthiness arising from this Commission’s pending consolidated dockets, Docket Nos. 2017-370-E, 2017-207-E, and 2017-305-E (the “Consolidated Dockets”).

2. Appendix “4” of the IA provides a schedule of project milestones. Milestone Payment #1 requires Beulah Solar to make a substantial payment equal to one-half of the estimated interconnection charges, by November 20, 2018. If Beulah Solar does not make this payment, Beulah Solar will be in default of its obligations under the IA.

3. There is substantial economic and regulatory uncertainty concerning the long-term future of SCE&G, arising from the many issues raised in the Consolidated Dockets currently pending before this Commission. Cypress Creek's financing parties are understandably unwilling to provide financing for the Milestone Payment #1, until some of this uncertainty is resolved. An extension of the Milestone Payment #1 deadline until January 2, 2019, (the first business day after January 1, 2019), would provide a reasonable amount of time after this Commission issues a ruling in the Consolidated Dockets, for Cypress Creek to assess the impact of any such ruling and to obtain financing.

4. Beulah Solar requests that this Commission approve this Request, without a Hearing and without Notice and without formalities. Counsel for Beulah Solar has communicated with Counsel for SCE&G and SCE&G does not oppose this Request.¹

5. Beulah Solar further requests that this Commission grant a tolling of any Milestone payment deadlines, as described hereinabove for all solar projects, similarly situated in South Carolina, upon a Request of the other projects to this Commission, after notice to SCE&G.

6. With the agreement from Counsel for SCE&G not to oppose this Request and Beulah Solar's Request that the same relief be granted for similarly situated projects in South Carolina, this Request should be approved without a Hearing and without Notice and without formalities.

7. Accordingly, Beulah Solar respectfully requests that this Commission toll the November 20, 2018 deadline and for subsequent dates for Milestone payments, for Milestone Payment #1, until the first business day after January 1, 2019,

¹ Counsel for SCE&G has also agreed that it will not oppose requests for tolling of deadlines for other similarly-situated projects in South Carolina.

8. Beulah Solar, LLC, is represented by Counsel in this proceeding:

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CONCLUSION

Based on the foregoing, Beulah Solar, LLC respectfully requests that this Commission inquire into this matter and Order the following relief, without a Hearing and without a Notice and without formalities.

WHEREFORE, Beulah Solar, LLC prays for the following relief:

- a. That this Commission toll the November 20, 2018 deadline and for subsequent dates for Milestone payments, for Milestone Payment # 1, until the first business day after January 1, 2019; and
- b. GRANT SUCH OTHER AND FURTHER RELIEF AS IS JUST AND PROPER.

November 19, 2018
Columbia, South Carolina

Respectfully Submitted,
/s/Richard L. Whitt,

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As Counsel for Beulah Solar, LLC.